



May 23, 2005

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: §1.1206(b)(1) Written ex parte Presentation
Service Rules for Advanced Wireless Services in the 1.7 GHz and 2.1 GHz Bands
WT Docket No. 02-353

Madame Secretary:

Pursuant to the Commission's rules,¹ Alcatel hereby submits this ex parte notice in WT Docket No. 02-353 to advocate and support the Joint Proposal of T-Mobile USA, Inc. ("T-Mobile") and the Rural Telecommunications Group, Inc. ("RTG") (collectively, "Parties") as submitted in this docket on March 11, 2005. Alcatel is a telecommunications equipment supplier that provides wireline, terrestrial wireless, and satellite solutions to service providers and enterprises in the United States and throughout the world.

In the Joint Proposal, the Parties petitioned the Commission to revise the band plan for Advanced Wireless Services ("AWS") in the 1710-1755 and 2110-2155 MHz bands in order to create a sixth AWS license block. The Parties advocate this revised band plan for compelling reasons that will promote an equitable distribution of licenses and services among geographic areas, economic opportunity for a wide variety of applicants, and investment in new technologies and services pursuant to §309(j)(4) of the Communications Act.²

In particular, by dividing the 30 MHz block into smaller size spectrum blocks (both geographically and in terms of megahertz) the Commission provides more opportunities for interested bidders and ensures licensees will not be forced to acquire more spectrum than is necessary to satisfy customer demands or business plans. Also, the creation of a sixth block in the smallest markets will promote an auction environment in which rural carriers will be able to afford adequate spectrum for voice and advanced data services in their markets.

¹ 47 CFR § 1.1206(b)(1).

² 47 CFR §309(j)(4).

Alcatel agrees with the Parties that this proposal to create a sixth block will provide needed bidding flexibility and will promote the Commission's obligations under §309(j)(4). The T-Mobile/RTG AWS band plan provides a menu of options that serves the needs of both small and large carriers. The band plan utilizes more licenses to promote more efficient usage of valuable spectrum for smaller carriers while allowing larger carriers the ability to aggregate licenses at auction (or in the secondary market) if their business plans or customer demands justify the usage. Likewise, the preservation and promotion of rural carrier interests at a time of increasing consolidation in the wireless industry is equally compelling. By introducing smaller license sizes and a variety of choices, the AWS spectrum becomes more compatible with the voice and advanced data services of carriers in rural markets.

If you have any questions or comments concerning Alcatel or this ex parte presentation, please do not hesitate to contact the undersigned. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "John Shelnut", is placed over a light blue rectangular background.

John Shelnut
Vice President
U.S. Mobile Carriers

Paul Kenefick
Senior Regulatory Counsel
Alcatel
1909 K Street, NW
Suite 800
Washington, DC 20006
202-715-3709